



California Regional Water Quality Control Board

Central Coast Region

Winston H. Hickox
Secretary for
Environmental
Protection

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Gray Davis
Governor

September 4, 2003

Mr. Richard W. McClure
Olin Corporation
Environmental Remediation Group
PO Box 248
Charleston, TN 37310-0248

Dear Mr. McClure:

425 TENNANT AVENUE, MORGAN HILL; REQUEST FOR EXPANDED SITE ASSESSMENT

As you are aware, perchlorate has been detected in several wells north of Tennant Avenue in Morgan Hill, including three wells used by the City of Morgan Hill for public water supply. Attached is a map generated by the Santa Clara Valley Water District showing perchlorate detections and existing wells in this area.

Pursuant to Water Code section 13267, please submit by October 3, 2003, to the Regional Board a plan for determining if detections of perchlorate found in wells between Olin's site and Morgan Hill's Nordstrom Park well are related to Olin's perchlorate releases at its site. At a minimum, in the plan Olin shall identify all wells within one fourth of a mile from a line connecting Olin's site and the Nordstrom Park well, provide data for any of those wells that have been sampled for perchlorate, and propose a monitoring and sampling program that will provide sufficient data to determine the extent of perchlorate-degraded groundwater northeast of Olin's site and groundwater gradients in the area.

The Regional Board needs the information required by this letter to determine the extent of perchlorate contamination and to determine whether Olin is responsible for contamination found northeast of the site.

Water Code section 13267 authorizes the Regional Board to direct a person who is suspected of discharging waste that could affect water quality to provide technical and monitoring program reports that the Regional Board requires.

The evidence that supports requiring Olin to provide the plan required by this letter includes the following:

1. Olin's property on Tennant Avenue is the only site in the area that we are aware of with confirmed releases of perchlorate to the environment.
2. Although groundwater appears to flow naturally in a southeast direction, there are conditions that could cause perchlorate-degraded water to migrate from Olin's site to the

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northeast. Pumping-induced gradient changes is one such condition. Water-level data, both current and historic, show that the gradient is relatively shallow in this area and could be influenced by the right set of pumping conditions. Successive pumping, irrigation, and infiltration could also have caused migration of degraded water over many years.

Additional supporting evidence can be found in the Regional Board files.

If you have any questions or wish to review the applicable evidence in Regional Board files, please contact **A. John Mijares at (805) 549-3696** or Harvey Packard at (805) 542-4639.

Sincerely,

Roger W. Briggs
Executive Officer

Attachment: Map showing existing wells and perchlorate detection

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cc:

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